

## FILED ELECTRONICALLY VIA ECFS

February 6, 2006

Marlene H. Dortch, Secretary Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

Re: EB-06-TC-060 & EB-06-36, Certification of CPNI Filing (February 6, 2006)

Dear Ms. Dortch:

Enclosed for filing is Mohave Cellular Limited Partnership's "Certification of CPNI Filing – February 6, 2006", as ordered in EB-06-TC-060 and EB-06-36.

If you have questions, please do not hesitate to contact me.

Sincerely,

Kevin Saville

Associate General Counsel

2378 Wilshire Blvd.

Mound, Minnesota 55364

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ksaville@czn.com

## Enclosure

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau, Federal Communications Commission, Room 4-A234, 445 12<sup>th</sup> Street, SW, Washington, DC 20554, via e-mail to: byron.mccoy@fcc.gov

Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, SW, Room CY-B402, Washington, DC 20554, via e-mail to: fcc@bcpiweb.com

## **MOHAVE CELLULAR LIMITED PARTNERSHIP** SECTION 64.2009(e) CERTIFICATION

Citizens Communications Company is the sole member company for CU Wireless Company LLC. CU Wireless Company LLC is the General Partner in Mohave Cellular Limited Partnership. I, Daniel J. McCarthy, a duly authorized officer of Citizens Communications Company, hereby certify on behalf of Mohave Cellular Limited Partnership, that I have personal knowledge that Mohave Cellular Limited Partnership has established operating procedures that are adequate to ensure compliance with the rules of the Federal Communications Commission, codified at 47 C.F.R. 64.2001-64.2009, implementing Section 222 of the Communications Act of 1934, as amended.

Daniel J. McCarthy

Executive Vice President and Chief Operating Officer

Citizens Communications Company

February 6, 2006

## STATEMENT OF EXPLANATION

In accordance with 47 C.F.R. 64.2009(e), the following statement accompanies the officer compliance certificate and explains how the operating procedures of Mohave Cellular Limited Partnership ("Mohave Wireless") ensure that the Company is in compliance with the Commission's CPNI rules, as codified at 47 C.F.R. 64.2001-64.2009:

- Mohave Wireless has implemented processes to ascertain whether customer CPNI will be used in marketing efforts and whether customer approval for the use of CPNI is required under the Commission's CPNI rules.
- Mohave Wireless does not share CPNI among its affiliates, unless prior customer approval has been obtained or no customer approval is required under the Commission's CPNI rules.
- Mohave Wireless does not disclose CPNI to unaffiliated third parties except as authorized by the customer or as compelled or authorized by law.
- Only authorized personnel can access CPNI. Mohave Wireless personnel so authorized, such as customer service representatives and billing and collection personnel, are instructed regarding the appropriate access to, use of, and disclosure of CPNI. Failure to abide by the applicable policies and procedures is cause for discipline.
- All marketing campaigns that utilize CPNI are subject to managerial approval and to verification of customer approval before CPNI is utilized. Records related to these marketing campaigns are maintained for at least one year.
- Mohave Wireless' managerial personnel monitor access to, use of, and disclosure
  of CPNI on an on-going basis to ensure compliance with the applicable policies
  and procedures and to evaluate their effectiveness.